

Schwartz Flansburg PLLC
Frank M. Flansburg III, Esq.
Nevada Bar No. 6974
6623 Las Vegas Blvd. South, Suite 3
Las Vegas, Nevada 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
frank@nvfirm.com
Attorneys for Counterdefendant
Land Home Financial Services, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RODNEY MOTT,

Plaintiff,

vs.

Case No.: 2:16-CV-01949-JCM-CWH

THE PNC FINANCIAL SERVICES GROUP, INC.; SELECT PORTFOLIO SERVICING, INC.; TRINITY FINANCIAL SERVICES, LLC and TROJAN CAPITAL INVESTMENTS, LLC; RADIAN SERVICES, LLC; and SPECIAL DEFAULT SERVICES, INC.,

Defendants.

**JOINT MOTION AND ORDER TO
EXTEND DEADLINE**

TROJAN CAPITAL INVESTMENTS, LLC:

Counterclaimant,

VS.

RODNEY MOTT; RADIAN SERVICES, LLC; PNC BANK, N.A.; THE PNC FINANCIAL SERVICES GROUP, INC.; BANK OF AMERICA, N.A.; SELECT PORTFOLIO SERVICING, INC.; WILMINGTON TRUST, NATIONAL ASSOCIATION, not in its individual capacity but solely as trustee under the Greenwich Investors XL Pass-Through Trust Agreement; DTA SOLUTIONS LLC; BSI FINANCIAL SERVICES INC.; DREAMBUILDER INVESTMENTS LLC;

1 LAND HOME FINANCIAL SERVICES, INC;
2 and Also all other persons unknown claiming any
3 right, title, estate, lien or interest in the real
4 property described in the counterclaim adverse to
counterclaimant's ownership in the referenced
lien and note stated herein, or any cloud upon
counterclaimant's title to the referenced lien and
note herein inclusive;

5
6 Counterdefendants.

7 **JOINT MOTION AND ORDER TO EXTEND DEADLINE**

8 Counterdefendant Land Home Financial Services, Inc. ("Land Home") and
9 Counterclaimant Trojan Capital Investments, LLC ("Trojan") (Land Home and Trojan
10 collectively, the "Parties"), by and through their counsel of record, jointly move to extend the
11 deadline for Land Home to respond to Trojan's counterclaim (ECF Doc. No. 38). The Parties
12 state that:

13 1. On August 16, 2016, this action was initiated by Plaintiff Rodney Mott.
14 2. On March 13, 2017, Trojan filed an amended answer and counterclaim, naming
15 Land Home as a counter-defendant (ECF No. 38).

16 3. The Parties now stipulate and agree to extend Land Home's deadline to respond
17 to the counterclaim to June 19, 2017.

18 4. This is the Parties' first request for an extension of this deadline, which is not
19 intended to cause any delay or prejudice to any party.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 5. The extension will allow Land Home to fully investigate Trojan's allegations in
2 the counterclaim so that Land Home may appropriately respond thereto.

3 Dated this 15th day of June, 2017

Dated this 15th day of June, 2017

4 SCHWARTZ FLANSBURG PLLC

5 BURKE, WILLIAMS & SORENSEN, LLP

6 /s/ Frank M. Flansburg III
7 Frank M. Flansburg III, Esq.
8 Nevada Bar No. 6974
9 6623 Las Vegas Blvd. South, Suite 300
10 Las Vegas, Nevada 89119

6 /s/ Richard J. Reynolds
7 Richard J. Reynolds, Esq.
8 Nevada Bar No. 11864
9 1851 East First St., Ste. 1550
10 Santa Ana, CA 92705

11 Attorneys for Counterdefendant
12 Land Home Financial Services, Inc.

11 Michael R. Brooks, Esq.
12 Nevada Bar No.
13 BROOKS HUBLEY, LLP
14 1645 Village center Cir., Ste. 60
15 Las Vegas, NV 89134

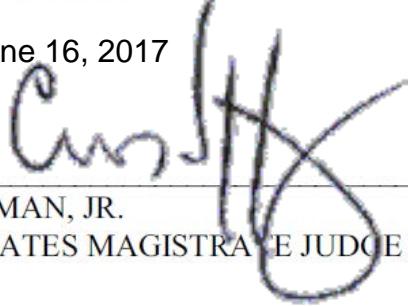
16 Attorneys for Counterclaimant
17 Trojan Capital Investments, LLC

18 **ORDER**

19 IT IS SO ORDERED.

20 IT IS SO ORDERED.

21 DATED: June 16, 2017

22 
23 C.W. HOFFMAN, JR.
24 UNITED STATES MAGISTRATE JUDGE

25 Submitted By:

26 SCHWARTZ FLANSBURG PLLC

27 /s/ Frank M. Flansburg III
28 Frank M. Flansburg III, Esq.
Nevada Bar No. 6974
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Attorneys for Counterdefendant
Land Home Financial Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of June, 2017., I served a copy of the foregoing **JOINT MOTION AND ORDER TO EXTEND DEADLINE** upon each of the parties via electronic service through the United States District Court for the District of Nevada's ECF system.

Michelle Tuason
Michelle Tuason, an employee of Schwartz
Flansburg PLLC